

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

**FILED**

AUG 09 2022

ABDELLA AHMAD TOUNISI  
Defendant-Petitioner

v.

UNITED STATES OF AMERICA  
Plaintiff-Respondent

THOMAS G. BRUTON  
CLERK, U.S. DISTRICT COURT

Case No. 13 CR 328  
JUDGE, Robert M. Dow Jr.

MOTION FOR COMPASSIONATE RELEASE FOR  
THE REDUCTION OF SENTENCE

I respectfully request that this Court grant me Compassionate Release through a sentence reduction pursuant to 18 U.S.C. §3582(c)(1)(A)(i) and 18 U.S.C. § 3553(a) from a sentence of 180 months in prison with a projected release date 01/29/26 and life supervised release to time-served, so that I may begin my supervised released.

- I was arrested and charged in April of 2013. Convicted in 2015 at the age of 20. Currently I'm 28 and I've been suffering from a few incurable medical problems.
- I was diagnosed with Psoriasis (an auto immune skin disorder) in March of 2021. I was then diagnosed with Psoriatic Arthritis (a type of inflammatory arthritis) and Ankylosing spondylitis (an inflammation of the spine) in February of this year. I was then prescribed immuno suppressant medicine (e.g. "Methotrexate 15mg" once a week from 3/14/22 - 7/11/22), ("Humera 40mg" shot every other week beginning on 7/27/22).
- Furthermore, I have been having difficulty breathing since the summer of 2020. I was prescribed a steroid inhaler (Albuterol) in August of 2021. I was told by a medical provider last month that I would be diagnosed with Asthma.
- Since the COVID-19 pandemic, I've been vaccinated and received a booster shot and I'm currently waiting for my 2nd.
- Due to the COVID-19 pandemic, especially with the current surge of the new variants, the risk is substantial of serious complications and death if I catch the virus because of my suppressed immune system and difficulty breathing.

- I sent a request for compassionate release to my Warden (FCI Terre Haute) on January 19, 2022. I received a denial response on February 9, 2022.
- Upon release I intend on becoming a good citizen through work, family, education and guidance from the probation office. I would be relocated to my mom and dad's house in Plainfield, IL where I would quarantine.

Conclusion

For the above reasons, I respectfully request that this Court should grant my Motion for Compassionate Release to "time-served" and to start my life supervised release.

Thank You,

*Abedella Townes*  
8/3/22

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